

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

**JUAN SANCHEZ MEDINA,**

Debtors.

CASE NO. **10-11268(MCF)**

**CHAPTER 13**

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**MOTION SUBMITTING AMENDED SCHEDULES "A" & "C"**

**TO THE HONORABLE COURT:**

Come now Debtors, represented by the undersigned attorney, and very respectfully aver and pray as follows:

1. On November 30, 2010, the debtor filed the instant case under the provisions of Chapter 13 of the Bankruptcy Code.

2. During the 341 Creditor meeting held on January 10, 2011, the Trustee required Debtor to amend the real property value at Schedule "A," pursuant to an updated appraisal of the property.

3. Based on the aforementioned, Debtor herein submits amendments to the following Chapter 13 schedules:

**AMENDED SCHEDULE A** – Amended to provide for Debtor's real estate property's latest appraised value.

**AMENDED SCHEDULE C** – Amended to take a new exemption value over Debtor's real estate property.

**WHEREFORE** Debtor very respectfully requests this Honorable Court to take notice of the aforementioned information in the amended Schedules "A" and "C".

**RESPECTFULLY SUBMITTED.**

**NOTICE:** Within ten (10) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** Debtor hereby certifies that a copy of this motion has been filed through the CM/ECF system, which will notify the United States Trustee and all CM/ECF system's appearing participants, and mailed to any case parties in the attached mailing list, upon knowing that they are non-CM/ECF participants.

In San Juan, Puerto Rico, this 17<sup>th</sup> day of January, 2011.

**/S/ Carlos C. Alsina Batista**

Carlos C. Alsina Batista

USDC-PR NO. 222801

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IN RE SANCHEZ MEDINA, JUAN L.

Case No. 10-11268-13

Debtor(s)

(If known)

### AMENDED SCHEDULE A - REAL PROPERTY

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a cotenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether the husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

**Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.**

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim."

If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

DESCRIPTION AND LOCATION OF PROPERTY	NATURE OF DEBTOR'S INTEREST IN PROPERTY	HUSBAND, WIFE, JOINT, OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION	AMOUNT OF SECURED CLAIM
3 Bedroom, 1 bathroom concrete property in Urb. Estancias del Parra, C-23, Lajas, Puerto Rico	Fee Simple		122,000.00	93,664.22
TOTAL			122,000.00	

(Report also on Summary of Schedules)

IN RE SANCHEZ MEDINA, JUAN L.

Case No. 10-11268-13

Debtor(s)

(If known)

**AMENDED SCHEDULE C - PROPERTY CLAIMED AS EXEMPT**

Debtor elects the exemptions to which debtor is entitled under:

☐ Check if debtor claims a homestead exemption that exceeds \$146,450. \*

(Check one box)

- ☒ 11 U.S.C. § 522(b)(2)  
☐ 11 U.S.C. § 522(b)(3)

DESCRIPTION OF PROPERTY	SPECIFY LAW PROVIDING EACH EXEMPTION	VALUE OF CLAIMED EXEMPTION	CURRENT VALUE OF PROPERTY WITHOUT DEDUCTING EXEMPTIONS
<b><u>SCHEDULE A - REAL PROPERTY</u></b>			
3 Bedroom, 1 bathroom concrete property in Urb. Estancias del Parra, C-23, Lajas, Puerto Rico	11 USC § 522(d)(1)	21,625.00	122,000.00
<b><u>SCHEDULE B - PERSONAL PROPERTY</u></b>			
BANK ACCOUNT AT BPPR, ACCT. NO. XXXXX1738	11 USC § 522(d)(5)	724.00	724.00
FURNITURE AND APPLIANCES AT CURRENT SALE PRICE IN LIQUIDATION SCENARIO. ESTIMATED AMOUNT, NOT VERIFIED.	11 USC § 522(d)(3)	3,500.00	3,500.00
JEWELRY. ESTIMATED AMOUNT, NOT VERIFIED.	11 USC § 522(d)(4)	1,450.00	3,000.00
	11 USC § 522(d)(5)	1,550.00	

**AMENDED DECLARATION CONCERNING DEBTOR'S SCHEDULES****DECLARATION UNDER PENALTY OF PERJURY BY INDIVIDUAL DEBTOR**

I declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of 17 sheets, and that they are true and correct to the best of my knowledge, information, and belief.

Date: January 17, 2011 Signature: /s/ JUAN L. SANCHEZ MEDINA  
**JUAN L. SANCHEZ MEDINA**

Debtor

Date: \_\_\_\_\_ Signature: \_\_\_\_\_  
 (Joint Debtor, if any)  
 [If joint case, both spouses must sign.]

**DECLARATION AND SIGNATURE OF NON-ATTORNEY BANKRUPTCY PETITION PREPARER (See 11 U.S.C. § 110)**

I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342 (b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required by that section.

Printed or Typed Name and Title, if any, of Bankruptcy Petition Preparer

Social Security No. (Required by 11 U.S.C. § 110.)

*If the bankruptcy petition preparer is not an individual, state the name, title (if any), address, and social security number of the officer, principal, responsible person, or partner who signs the document.*

Address

Signature of Bankruptcy Petition Preparer

Date

Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document, unless the bankruptcy petition preparer is not an individual:

*If more than one person prepared this document, attach additional signed sheets conforming to the appropriate Official Form for each person.*

*A bankruptcy petition preparer's failure to comply with the provision of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. § 110; 18 U.S.C. § 156.*

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the \_\_\_\_\_ (the president or other officer or an authorized agent of the corporation or a member or an authorized agent of the partnership) of the \_\_\_\_\_ (corporation or partnership) named as debtor in this case, declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of \_\_\_\_\_ sheets (*total shown on summary page plus 1*), and that they are true and correct to the best of my knowledge, information, and belief.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

(Print or type name of individual signing on behalf of debtor)

*[An individual signing on behalf of a partnership or corporation must indicate position or relationship to debtor.]*

*Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §§ 152 and 3571.*

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